

EXHIBIT 5

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

GUI GLOBAL PRODUCTS, LTD. d/b/a
GWEE,

Plaintiff,

vs.

SAMSUNG ELECTRONICS CO., LTD.,
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

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4:20-cv-02624-AHB

**DECLARATION OF SEOUNGHYUN SON IN SUPPORT OF DEFENDANTS' MOTION
TO TRANSFER VENUE UNDER 28 U.S.C. § 1404(a)**

I, Seounghyun Son, declare and state as follows:

1. I am over 18 years of age and competent to make this declaration. If called as a witness, I could and would testify competently to the information contained herein.

2. I am an industrial designer at Samsung's Design Innovation Center in San Francisco, California ("SDIC"), and I have worked in consumer electronics design related roles at SDIC, formerly known as Samsung Design America, since 12/02/2013. I work out of SDIC's office at 735 Battery Street, San Francisco, California or out of my home in San Francisco, California.

3. In my design roles at SDIC, I was part of the team that conceptualized and designed the product that became the Galaxy Buds for Samsung. We worked on the look and feel of the device, as well as critical functional aspects. In particular, my role was to lead design of ICONX, ICONX 2018 and Galaxy Buds.

4. The Galaxy Buds design team maintains at SDIC offices design documents, presentations, and materials related to the work we did to create Galaxy Buds. We also maintain information related to predecessor products that were in the development line of the Galaxy Buds, including other wireless earphone systems. To my understanding, nearly all, if not all, of the technical documents and source code relating to the design and development of the Galaxy Buds resides either with the SDIC design team in San Francisco, California or the product development team resident in Korea.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 6th, 2020 in San Francisco, California.

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Seounghyun Son